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October 15, 2020

Donald R. Schwer III, Enforcement Investigator  
U.S. Environmental Protection Agency, Region 5  
Superfund & Emergency Management Division  
Enforcement Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**SUBJECT: REQUEST FOR INFORMATION PURSUANT TO SECTION 104(E) OF THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)  
MOTOR WHEEL DISPOSAL SITE (MWDS)  
1401 LAKE LANSING ROAD, LANSING, INGHAM COUNTY, MICHIGAN  
SITE/SPILL IDENTIFIER (SSID): 05S5**

Dear Mr. Schwer,

This letter is in response to the Request for Information (RFI) regarding two properties owned by Lansing Board of Water & Light (BWL) and located near the Motor Wheel Disposal Site (MWDS). EPA is requesting information and documents relating to groundwater contamination at the MWDS to determine whether additional upgradient sources of contamination are impacting the cleanup efforts at the MWDS. The sites subject to this information request are described below.

**North Lansing Landfill (Tax Parcel No. 33-21-01-03-451-005)**

The North Lansing Landfill (NLL) is located on Lake Lansing Road in Lansing Township and is a former sand and gravel quarry that operated from 1953 to 1969. In 1974, BWL entered into a land contract to purchase the property, and subsequently received a solid waste landfill permit for disposal of inert fill materials, including soil, concrete and brick from BWL facilities. In 1979 BWL applied for and received a license as a Type III landfill. The BWL operated the landfill for disposal of coal combustion residuals (CCRs) and inert fill materials from 1980 to January 1, 1997. Waste was not accepted from non-BWL owned facilities and only nonhazardous solid waste was disposed of at the NLL.

The site was closed following the discovery of groundwater contamination in the upper aquifer and a Consent Order was negotiated with the Michigan Department of Environmental Quality (now Michigan Department of Environment, Great Lakes and Energy, or "EGLE") to address that contamination. The interim remedial action plan included installation of a slurry wall, a gradient control system, capping, and groundwater pump and treatment to prevent the migration of contamination from the site. These items have been completed, and groundwater sampling is conducted semi-annually, and annual reports submitted to EGLE.





This parcel includes an electrical substation, identified as Northeast Substation. The first transformer was energized on August 29, 1990 and subsequently the second transformer was energized on June 21, 1996. The transformers do not contain oil with regulated concentration of Polychlorinated biphenyl (PCBs).

Well Site 25-29 (Tax Parcel No. 33-01-01-03-176-061)

BWL purchased this site on March 22, 1956 for the purpose of installing a drinking water well. Well No. 25-29 was installed on May 3, 1956. The well is no longer in operation and was abandoned on June 19, 2019.

BWL has provided information and available documentation to the best of its knowledge for each site as Enclosure 1 and 2. Enclosure 3 contains the Information Request Declaration.

If you have any questions regarding this submittal, please contact Cheryl Louden, Environmental Compliance Specialist at 517-449-9187 or [Cheryl.Louden@lbwl.com](mailto:Cheryl.Louden@lbwl.com).

Sincerely,

Lori L. Myott  
Manager, Environmental Services and Reliability Compliance Department  
[Lori.Myott@lbwl.com](mailto:Lori.Myott@lbwl.com)  
517-702-6639

cc: Mark Matus, General Counsel, BWL



**Parcel No. 33-21-01-03-451-005 – North Lansing Landfill**

*Parcel No. 33-21-01-03-451-005 is referred to as the BWL North Lansing Landfill (NLL) located at Lake Lansing Road in Lansing Township. NLL is a former sand and gravel quarry that operated from 1953 to 1969. In 1974, BWL received a solid waste landfill permit for disposal of inert fill materials from BWL facilities, including soil, concrete and brick. In 1979 BWL purchased the property and applied and received a license as a Type III landfill. The BWL operated the landfill for disposal of coal combustion residuals (CCRs) and inert fill materials from 1980 to January 1, 1997. Waste was not accepted from non-BWL owned facilities and only nonhazardous solid waste was disposed of at the NLL.*

*The site was closed in 1997 following the discovery of groundwater contamination in the upper aquifer and a Consent Order was negotiated with the Michigan Department of Environmental Quality (now Michigan Department of Environment, Great Lakes and Energy, or “EGLE”) to address that contamination. The interim remedial action plan included installation of a slurry wall, a gradient control system, capping, and groundwater pumping and treatment to minimize the migration of contamination from the site. These items were completed 2010, and groundwater sampling is conducted semi-annually, with annual reports submitted to EGLE.*

*This parcel also includes an electrical substation, identified as Northeast Substation. The first transformer was energized on August 29, 1990 and subsequently the second transformer was energized on June 21, 1996. Records are included in the response to Question 12 that confirm the transformers do not contain oil with regulated concentration of Polychlorinated biphenyl (PCBs).*

1. Identify all persons consulted in the preparation of the answers to these Information Requests.  
*Ms. Cheryl Louden, Senior Environmental Compliance Specialist  
Ms. Lori Myott, Manager Environmental Services and Regulatory Compliance  
Mr. Mark Matus, General Counsel  
Mr. Darin Thelen, Supervisor, Real Property Management and Surveyor  
Mr. Chris Knudstrup, Manager, Electrical T&D Engineering & Technical Services  
Mr. Collin Germain, Electrical Engineer  
Mr. Richard Peffley, General Manager  
Ms. Jessica Harbitz, Emergency Planning Specialist*
2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.  
*See Enclosure 1. The enclosure contains the requested files in folders identified by corresponding question number.*
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

*Several retired employees have knowledge of the remediation project (i.e., initial investigation, Slurry Wall) at this site. Although they were not directly contacted, they provided information in support of various reports that have been included in this information request, particularly the Final Source*

*Control Design Construction Documentation Report Slurry Wall Final 20100118 and 1996 DEQ Response to 1995 Hydrogeologic study.*

*Mr. Nick Burwell retired as Director of IT, former Manager, Environmental Services*

*Mr. Jack Hill, retired, Environmental Director and Owners Representative for Slurry Wall construction*

*Mr. Fritz Domres, retired, Environmental Field Technician*

*Ms. Gail Peterson, retired, Environmental Engineer*

4. List the EPA Identification Numbers of the Respondent.

*There is no EPA Identification Number associated with this site.*

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom.

*To the best of BWL knowledge this question is not applicable.*

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by BWL, BWL's contractors or by prior owners and/or operators.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

7. Did BWL ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify;

- (a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
- (b) Who supplied BWL with such hazardous substances;
- (c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL;
- (d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL;
- (e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL; and
- (f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by BWL.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

8. Has BWL or any other person working with BWL or on BWL's behalf ever accepted hazardous waste materials for transportation to the BWL property (to transshipment property) from any person? If the answer to this question is anything but an unequivocal no, identify:

- (a) The persons from whom BWL or such other persons accepted hazardous waste materials for transport to the BWL property;
- (b) Every date on which hazardous waste materials were so accepted or transported;

- (c) For each transaction, the nature of the hazardous waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the material was used or the process which generated the material;
- (d) For each hazardous waste material, describe any warnings given to BWL with respect to its handling;
- (e) The owner of the hazardous materials so accepted or transported;
- (f) The quantity of the hazardous material involved (weight or volume) in each transaction and the total quantity for all transactions;
- (g) All tests or analyses and analytical results concerning each hazardous material; and
- (h) The price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of hazardous waste materials brought to the BWL property.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable*

9. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of hazardous waste materials at the BWL property or to the BWL property or (transshipment property). In addition, identify the following:

- (a) The persons with whom BWL or such other persons made such arrangements, including, but not limited to (provide list of transporters);
- (b) Every date on which such arrangements took place;
- (c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;
- (d) The owner of the hazardous waste materials or hazardous substances so accepted or transported;
- (e) The quantity of the hazardous waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- (f) All tests, analyses and analytical results concerning the hazardous waste materials;
- (g) The person(s) who selected the BWL property (or transshipment property) as the place to which the hazardous waste materials or hazardous substances were to be transported;
- (h) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;
- (i) Where the person identified in g. above intended to have such hazardous substances or hazardous waste materials transported and all evidence of this intent;
- (j) Whether the hazardous waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- (k) What was actually done to the waste materials or hazardous substances once they were brought to the BWL property;
- (l) The final disposition of each of the hazardous waste materials or hazardous substances involved in such transactions;
- (m) The measures taken by BWL to determine the actual methods, means and site of treatment or disposal of the hazardous waste material and hazardous substances involved in each transaction;

- (n) The type and number of containers in which the hazardous waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the BWL property, and all markings on such containers;
- (o) The price paid for (i) transport or (ii) disposal of (iii) or both, of each hazardous waste material and hazardous substance;
- (p) All documents containing information responsive to (a) – (o) above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
- (q) All persons with knowledge, information or documents responsive to questions (a) – (o), above.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

10. Describe the nature of BWL's activities or business at the BWL property, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the BWL property.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

11. State the dates during which BWL owned, operated or leased the BWL property and provide copies of all documents evidencing or relating to such ownership, operation or lease arrangement (e.g., deeds, leases).

*Electric Easement – 1959 – Liber 772, Page 065 – Blue Ribbon Builders Inc. to Lansing Board of Water & Light – Use Agreement.*

*Warranty Deed – 1976 – Liber 1191 Page 1084 – Blue Ribbon Builders Inc. to Prince & Mlejnek.*

*Land Contract – 1979 – Liber 1301 Page 814 – Prince & Mlejnek d/b/a Blue Ribbon Builders to Lansing Board of Water & Light.*

*Warranty Deed – 1994- Liber 2209 Page 955 – Prince, Johnson, Cliffe, Mlejnek Trust (formerly d/b/a Blue Ribbon Builders) to Lansing Board of Water & Light.*

*See Enclosure 1- Question 11*

12. Provide information about the BWL property, including but not limited to the following:

*See Enclosure 1 - Question 12*

- (a) Property boundaries, including a written legal description;

*See Enclosure 1 - Question 12*

- (b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

*See Enclosure 1 - Question 19 Slurry wall Construction report; Hydraulic Gradient Construction Report*

- (c) Surface structures (e.g., buildings, tanks);

*There are no tanks located onsite. Two structures are currently on site, the Northeast Substation and the Hydraulic Gradient Control building.*

- (d) Ground water wells, including drilling log;

*This parcel does not contain groundwater drinking water wells. Monitoring and Extraction wells associated with the final source remedy can be found in Enclosure 1 - Question 19, the Slurry wall Construction report; Hydraulic Gradient Construction Report. Monitoring wells associated with landfill operations can be found in Enclosure 1 - Question 28.*

- (e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;

*The parcel does not contain a septic tank, subsurface disposal field or municipal owned sanitary sewer system. The Hydraulic Gradient System discharges to the City of Lansing sanitary sewer system offsite. Stormwater is controlled by slope gradient and most of the storm water remains on site otherwise it is discharge to Groesbeck drain operated by Ingham County Drain Commission.*

- (f) Any and all additions, demolitions or changes of any kind on, under or about the BWL property, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the BWL property; and

*The landfill operations are closed and to the best of BWL knowledge BWL does not have knowledge of site uses other those described above and below... Additionally, no changes are planned at this time.*

- (g) All maps and drawings of the Site in your possession.

*A general map of parcel is included in Enclosure 1 - Question 12. Additional maps and drawings of the site can be found in Enclosure 1 - Question 19 and Question 21.*

13. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas) on the BWL property (or your property). For each such solid waste unit identified, provide the following information:

*See Enclosure 1 - Question 19, HMP Report-1995 Hydrogeologic study.pdf for 13. a,b,c,d,e, and f.*

- (a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
- (b) The type of unit (e.g., storage area, landfill, waste pile), and the dimensions of the unit;
- (c) The dates that the unit was in use;
- (d) The purpose and past usage (e.g., storage, spill containment);
- (e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;

*The only materials on site were inert, solid nonhazardous wastes*

- (f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit; and
- (g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

*The site was closed on January 1, 1979. The interim remedial action plan included installation of a slurry wall, a gradient control system, capping, and groundwater pump and treatment to prevent the migration of contamination from the site.*

14. Identify the prior owners of the BWL property. For each prior owner, further identify:

- (a) The dates of ownership;

*Blue Ribbon Builders, Inc operated a sand and gravel quarry until May 13, 1976 when property was transferred to Prince & Mlejnek who continued sand and gravel quarry operations. 1979 the property was transferred BWL.*

- (b) All evidence showing that they controlled access to the BWL property; and

*To the best of BWL knowledge BWL does not have such evidence.*

- (c) All evidence that a hazardous substance, pollutant or, was released or threatened to be released at the BWL property during the period that they owned the BWL property.

*The BWL is not aware of any such releases.*

15. Identify the prior operators, including lessors, of the BWL property. For each such operator, further identify:

*Blue Ribbon Builders, Inc operated a sand and gravel quarry until May 13, 1976 when property was transferred to Prince & Mlejnek who continued sand and gravel quarry operations. 1979 the property was transferred BWL.*

- (a) The dates of operation;

*Blue Ribbon Builders, Inc operated a sand and gravel quarry until May 13, 1976 when property was transferred to Prince & Mlejnek who continued sand and gravel quarry operations. 1979 the property was transferred BWL.*

- (b) The nature of prior operations at the BWL property;

*Sand and gravel quarry*

- (c) All evidence that they controlled access to the BWL property; and

*Prior to BWL ownership, Blue Ribbon Builder's operated the landfill. See Enclosure 1; Question 15*

- (d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the BWL property and/or its solid waste units during the period that they were operating the BWL property.

*To the best of BWL knowledge no such releases occurred.*

16. Provide copies of all local, state and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, National Pollutant Discharge Elimination System permits).

*See Enclosure 1 - Question 16 for all former expired landfill, construction permits and active municipal discharge permits.*

17. Did the facility ever have "interim status" under RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

*The site is currently under interim status pursuant to Michigan's Natural Resources and Environmental Protection Act (NEREPA) (excerpt) Act 451 of 1994, Part 201 Environmental Remediation for the release of metals. The site is not subject to RCRA.*

18. Did the facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.

*To the best of BWL knowledge this question is not applicable.*

19. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the BWL property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data. Provide all reports and data generated related to environmental investigations at the BWL property.

*See Enclosure 1 - Question 19*

20. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the BWL property? If so, identify:

*Interim remedial action plan groundwater monitoring pursuant to (NEREPA) (excerpt) Act 451 of 1994, Part 201 Environmental Remediation continues. No additional investigations are planned.*

- (a) What the nature and scope of these investigations will be;
- (b) The contractors or other persons that will undertake these investigations;
- (c) The purpose of the investigations;
- (d) The dates that such investigations will take place and be completed; and
- (e) Where on the BWL property such investigations will take place.

21. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the BWL property. In addition, identify:

*See Enclosure 1 – Question 19; Files indicate a release occurred in groundwater monitoring in 1993.  
The history is summarized in HMP Report-1995 Hydrogeologic study.pdf*

- (a) When such releases occurred;
- (b) How the releases occurred;
- (c) The amount of each hazardous substances, pollutants, or contaminants so released;
- (d) Where such releases occurred;
- (e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- (f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and
- (g) All persons with information relating to these releases.

*Ms. Cheryl Louden, Senior Environmental Compliance Specialist*

*Ms. Lori Myott, Manager Environmental Services and Regulatory Compliance*

*Mr. Mark Matus, General Counsel*

*Ms. Jessica Harbitz, Emergency Planning Specialist*

22. Did any leaks, spills or releases of hazardous materials occur on the BWL property when such materials were being:

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable*

- (a) Delivered by a vendor;
- (b) Stored (e.g., in any tanks, drums or barrels);
- (c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units); and
- (d) Treated.

23. Has soil ever been excavated or removed from the BWL property? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

*To the best of BWL knowledge soil excavation occurred during construction activities. See Enclosure 1 Question 21, Slurry wall Construction report; Hydraulic Gradient Construction Report*

- (a) Amount of soil excavated;
- (b) Location of excavation;
- (c) Manner and place of disposal and/or storage of excavated soil;
- (d) Dates of soil excavation;
- (e) Identity of persons who excavated or removed the soil;
- (f) Reason for soil excavation;
- (g) Whether the excavation or removed soil contained hazardous materials and why the soil
- (h) contained such materials; and
- (i) All analyses or tests and results of analyses of the soil that was removed from the BWL property

24. Provide a list of all transporters (names, addresses, and EPA Identification numbers) disposing of waste at the Landfill by year. If the waste was or is being disposed of pursuant to a written contract, provide a copy of any contracts or agreements.

*All waste deposited at the landfill were from BWL facilities; therefore, to the best of BWL knowledge this question is not applicable.*

25. Provide a list of all industries (names, addresses, and EPA Identification numbers) disposing of waste at the Landfill by year. If the waste was or is being disposed of pursuant to a written contract, provide a copy of any contracts or agreements.

*To the best of BWL knowledge only inert and CCR waste generated by BWL facilities was accepted at this site and therefore this question is not applicable.*

26. Provide the names, addresses, and telephone numbers of all persons responsible for the financial recordkeeping for the Landfill, past and present.

*Heather Shawa, Chief Financial Officer, 1201 S. Washington Street, Lansing, Michigan 48910, 517-702-6256*

27. Identify all persons directly involved in overseeing activities at the Site, including employees who have knowledge, information or documents about the quarry and landfill operations.

*Ms. Cheryl Louden, Senior Environmental Compliance Specialist*

*Ms. Lori Myott, Manager Environmental Services and Regulatory Compliance*

*Mr. Mark Matus, General Counsel*

*Mr. Richard Peffley, General Manager*

28. Provide copies of boring logs, geologic reports, well logs, well locations, soil samples, and all sampling data including sampling locations of all such samples for the Site.

*See Enclosure 1 - Question 28*

29. Provide a description of the method of waste disposal (e.g. whether the waste was compacted or crushed prior to disposal), the thickness of waste deposited, and the amount of clean cover on top of the waste.

*See Enclosure 1 - Question 21 Hydraulic Gradient Construction Report, Geosynthetic Cover Construction Documentation and HMP Report-1995 Hydrogeologic study.pdf*

30. Provide narrative and documentary information as to any waste the Landfill has ever had transported offsite, including but not limited to copies of:

*To the best of BWL knowledge any waste shipped off site would have occurred during construction of remediation projects. Shipping manifests were not required as all waste was nonhazardous. To the best of BWL knowledge shipping documents, if any, were not retained. See Enclosure 1 - Question 21, Hydraulic Gradient Construction Report, Geosynthetic Cover Construction Documentation and HMP Report-1995 Hydrogeologic study.pdf*

- (a) shipping manifests;
- (b) shipping logs;
- (c) receipts;
- (d) weight tickets; and/or
- (e) permits.

31. Has the BWL landfill ever been closed or shut down for any period of time? If so, provide the dates and circumstances under which the landfill was closed.

*The landfill stopped accepting waste January 1, 1997, and received State of Michigan, NERPA PA Act 51, Part 115, Solid Waste Management closure approval on May 10, 2018.*

## **Parcel No. 33-01-01-03-176-061 – Well No. 25-29**

*Parcel No. 33-01-01-03-176-061 was purchased on March 22, 1956 for the purpose of installing a drinking water well. Drinking Water Well No. 25-29 was installed on May 3, 1956. The well is no longer in operation and was abandoned on June 19, 2019. The parcel never received or disposed of waste.*

1. Identify all persons consulted in the preparation of the answers to these Information Requests.  
*Ms. Cheryl Louden, Senior Environmental Compliance Specialist  
Ms. Geneva Vanlerberg, Manager, Water Production  
Mr. Lee Nim, Supervisor, Crew - Maintenance Mechanic  
Ms. Cindy Irving, Portfolio Manager (former Water Plant Engineer)  
Ms. Angie Goodman, Water Quality Administrator  
Mr. Darin Thelen, Supervisor, Real Property and Surveyor*
2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.  
*See Question 2.*
  - *Warranty Deed*
  - *Certificate of Survey*
  - *Well Log*
  - *VOC test results*
  - *Abandoned Well Plugging Record*
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.  
*No other persons can provide information.*
4. List the EPA Identification Numbers of the Respondent.  
*There is no EPA Identification Number associated with this site.*
5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom.  
*To the best of BWL knowledge this question is not applicable.*
6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by BWL, BWL's contractors or by prior owners and/or operators.  
*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*
7. Did BWL ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify;
  - (a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;

- (b) Who supplied BWL with such hazardous substances;
- (c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL;
- (d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL;
- (e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by BWL; and
- (f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by BWL.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

8. Has BWL or any other person working with BWL or on BWL's behalf ever accepted hazardous waste materials for transportation to the BWL property (to transshipment property) from any person? If the answer to this question is anything but an unequivocal no, identify:

- (a) The persons from whom BWL or such other persons accepted hazardous waste materials for transport to the BWL property;
- (b) Every date on which hazardous waste materials were so accepted or transported;
- (c) For each transaction, the nature of the hazardous waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the material was used or the process which generated the material;
- (d) For each hazardous waste material, describe any warnings given to BWL with respect to its handling;
- (e) The owner of the hazardous materials so accepted or transported;
- (f) The quantity of the hazardous material involved (weight or volume) in each transaction and the total quantity for all transactions;
- (g) All tests or analyses and analytical results concerning each hazardous material; and
- (h) The price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of hazardous waste materials brought to the BWL property.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

9. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of hazardous waste materials at the BWL property or to the BWL property or (transshipment property). In addition, identify the following:

- (a) The persons with whom BWL or such other persons made such arrangements, including, but not limited to (provide list of transporters);
- (b) Every date on which such arrangements took place;
- (c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;
- (d) The owner of the hazardous waste materials or hazardous substances so accepted or transported;

- (e) The quantity of the hazardous waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- (f) All tests, analyses and analytical results concerning the hazardous waste materials;
- (g) The person(s) who selected the BWL property (or transshipment property) as the place to which the hazardous waste materials or hazardous substances were to be transported;
- (h) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;
- (i) Where the person identified in g. above intended to have such hazardous substances or hazardous waste materials transported and all evidence of this intent;
- (j) Whether the hazardous waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- (k) What was actually done to the waste materials or hazardous substances once they were brought to the BWL property;
- (l) The final disposition of each of the hazardous waste materials or hazardous substances involved in such transactions;
- (m) The measures taken by BWL to determine the actual methods, means and site of treatment or disposal of the hazardous waste material and hazardous substances involved in each transaction;
- (n) The type and number of containers in which the hazardous waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the BWL property, and all markings on such containers;
- (o) The price paid for (i) transport or (ii) disposal of (iii) or both, of each hazardous waste material and hazardous substance;
- (p) All documents containing information responsive to (a) – (o) above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
- (q) All persons with knowledge, information or documents responsive to questions (a) – (o), above.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

10. Describe the nature of BWL's activities or business at the BWL property, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the BWL property.

*To the best of BWL knowledge no such substances were on site and therefore this question is not applicable.*

11. State the dates during which BWL owned, operated or leased the BWL property and provide copies of all documents evidencing or relating to such ownership, operation or lease arrangement (e.g., deeds, leases).

*BWL purchased this site on March 22, 1956 for the purpose of installing a drinking water well. Well No. 25-29 was installed on May 3, 1956. The well is no longer in operation and was abandoned on June 19, 2019.*

*See Question 2 – Warranty Deed and Abandoned Well Plugging Record*

12. Provide information about the BWL property, including but not limited to the following:

- (a) Property boundaries, including a written legal description;

*See Question 2 – Certificate of Survey*

- (b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

*Upon thorough review of available documents, BWL does not have record of this information.*

- (c) Surface structures (e.g., buildings, tanks);

*Upon thorough review of available documents, BWL does not have record of this information.*

- (d) Ground water wells, including drilling log;

*See Question 2 – Well Log*

- (e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;

*Upon thorough review of available documents, BWL does not have record of this information.*

- (f) Any and all additions, demolitions or changes of any kind on, under or about the BWL property, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the BWL property; and

*Upon thorough review of available documents, BWL does not have record of this information.*

- (g) All maps and drawings of the Site in your possession.

*See Question 2 – Certificate of Survey*

13. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas) on the BWL property (or your property). For each such solid waste unit identified, provide the following information:

- (a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

- (b) The type of unit (e.g., storage area, landfill, waste pile), and the dimensions of the unit;

- (c) The dates that the unit was in use;

- (d) The purpose and past usage (e.g., storage, spill containment);

- (e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;

- (f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit; and

- (g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

*To the best of BWL knowledge, no such solid waste units existed on this site.*

14. Identify the prior owners of the BWL property. For each prior owner, further identify:

- (a) The dates of ownership;

*Frandora Reality owned the parcel prior to March 22, 1956. BWL has owned it since.*

- (b) All evidence showing that they controlled access to the BWL property; and  
*To the best of BWL knowledge BWL does not have such evidence.*
- (c) All evidence that a hazardous substance, pollutant or, was released or threatened to be released at the BWL property during the period that they owned the BWL property.  
*To the best of BWL knowledge no such releases occurred.*

15. Identify the prior operators, including lessors, of the BWL property. For each such operator, further identify:

- (a) The dates of operation;
- (b) The nature of prior operations at the BWL property;
- (c) All evidence that they controlled access to the BWL property; and
- (d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the BWL property and/or its solid waste units during the period that they were operating the BWL property.

*To the best of BWL knowledge, BWL does not have information on prior operators. It is believed the site was vacant when purchased by BWL.*

16. Provide copies of all local, state and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, National Pollutant Discharge Elimination System permits).  
*To the best of BWL knowledge there are no permits associated with this site.*

17. Did the facility ever have "interim status" under RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.  
*To the best of BWL knowledge this question is not applicable.*

18. Did the facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.  
*To the best of BWL knowledge this question is not applicable.*

19. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the BWL property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data. Provide all reports and data generated related to environmental investigations at the BWL property.

*Upon thorough review of available documents BWL does not have record of this information.*  
*Applicable documents are contained in Question 2.*

20. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the BWL property? If so, identify:  
*No investigations are planned.*

- (a) What the nature and scope of these investigations will be;
- (b) The contractors or other persons that will undertake these investigations;
- (c) The purpose of the investigations;
- (d) The dates that such investigations will take place and be completed; and

- (e) Where on the BWL property such investigations will take place.
21. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the BWL property. In addition, identify:  
*To the best of BWL knowledge, no such leaks, spills or releases occurred.*
- (a) When such releases occurred;
  - (b) How the releases occurred;
  - (c) The amount of each hazardous substances, pollutants, or contaminants so released;
  - (d) Where such releases occurred;
  - (e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
  - (f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and
  - (g) All persons with information relating to these releases.
22. Did any leaks, spills or releases of hazardous materials occur on the BWL property when such materials were being:  
*To the best of BWL knowledge, no such leaks, spills or releases occurred.*
- (a) Delivered by a vendor;
  - (b) Stored (e.g., in any tanks, drums or barrels);
  - (c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units); and
  - (d) Treated.
23. Has soil ever been excavated or removed from the BWL property? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:  
*Upon thorough review of available documents, BWL does not have record of this information.*
- (a) Amount of soil excavated;
  - (b) Location of excavation;
  - (c) Manner and place of disposal and/or storage of excavated soil;
  - (d) Dates of soil excavation;
  - (e) Identity of persons who excavated or removed the soil;
  - (f) Reason for soil excavation;
  - (g) Whether the excavation or removed soil contained hazardous materials and why the soil
  - (h) contained such materials; and
  - (i) All analyses or tests and results of analyses of the soil that was removed from the BWL property
24. Provide a list of all transporters (names, addresses, and EPA Identification numbers) disposing of waste at the Landfill by year. If the waste was or is being disposed of pursuant to a written contract, provide a copy of any contracts or agreements.  
*This site does not contain a landfill.*

25. Provide a list of all industries (names, addresses, and EPA Identification numbers) disposing of waste at the Landfill by year. If the waste was or is being disposed of pursuant to a written contract, provide a copy of any contracts or agreements.

*This site does not contain a landfill.*

26. Provide the names, addresses, and telephone numbers of all persons responsible for the financial recordkeeping for the Landfill, past and present.

*This site does not contain a landfill.*

27. Identify all persons directly involved in overseeing activities at the Site, including employees who have knowledge, information or documents about the quarry and landfill operations.

*This site does not contain a landfill.*

28. Provide copies of boring logs, geologic reports, well logs, well locations, soil samples, and all sampling data including sampling locations of all such samples for the Site.

*See Question 2*

29. Provide a description of the method of waste disposal (e.g. whether the waste was compacted or crushed prior to disposal), the thickness of waste deposited, and the amount of clean cover on top of the waste.

*This site does not contain a landfill.*

30. Provide narrative and documentary information as to any waste the Landfill has ever had transported offsite, including but not limited to copies of:

*This site does not contain a landfill.*

- (a) shipping manifests;
- (b) shipping logs;
- (c) receipts;
- (d) weight tickets; and/or
- (e) permits.

31. Has the BWL landfill ever been closed or shut down for any period of time? If so, provide the dates and circumstances under which the landfill was closed.

*This site does not contain a landfill.*

**Enclosure 3**

**DECLARATION**

Information Request

Motor Wheel Disposal Site

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I declare under penalty of perjury that I am authorized to respond on behalf of the Respondent and that the foregoing is complete, true, and correct.

Executed on October 15, 2020.

Signature

A handwritten signature in black ink, appearing to read "Lori Myott", is written over a horizontal line.

Type or Print Name

Lori Myott